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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARIA C. VAN ZANDT,
Plaintiff,

v.

QUANTUM COLLECTIONS, INC.;
BARCLAYS BANK, DELAWARE; FORD
MOTOR CREDIT-OMAHA SERVICE
CENTER; FORD MOTOR CREDIT
COMPANY; EQUIFAX INFORMATION
SERVICES, LLC; EXPERIAN
INFORMATION SOLUTIONS, INC.,
Defendants.

Case No. 2:16-cv-01116-APG-NJK

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES (FIRST
REQUEST)**

Complaint filed: May 18, 2016

IT IS HEREBY STIPULATED by and between Plaintiff Maria Van Zandt ("Plaintiff")
and Defendant Experian Information Solutions, Inc. ("Experian"), through their respective
attorneys of record, as follows:

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STIPULATION

Pursuant to Local Rules 26-4 and IA 6-1, the parties hereby submit the following Stipulation and Order to Extend Discovery Deadlines (First Request) to extend certain discovery deadlines in this case by approximately fifty-nine (59) days.

I. REASONS FOR EXTENSION TO COMPLETE DISCOVERY

Pursuant to Local Rule IA 6-1, the parties submit that good cause exists for the 59-day extension requested below for the following reasons:

The parties move for an extension of the discovery deadlines to conduct previously scheduled depositions based on Experian's unavailability. During the course of discovery, Plaintiff originally noticed a 30(b)(6) deposition of Experian on October 14, 2016 for November 1, 2016. Experian has not served a formal objection to the notice, but informed Plaintiff that Experian did not have any witnesses available on that date. Following a lengthy meet and confer process, the parties contacted the Court pursuant to LR 1-1(b).¹ The Court required the parties submit a joint submission of their positions regarding the discovery dispute. On November 4, 2016, following the filing of this joint submission, the Court vacated the LR 1-1(b) conference and directed the parties to meet and confer to determine new deposition dates and, where necessary, stipulate to the reasonable extension of discovery.² The parties have now mutually agreed to January 10, 2017, as the date for Experian's 30(b)(6) witnesses. Accordingly, the parties seek an extension of the discovery period to allow that deposition to go forward. The parties have further stipulated that the scope of discovery be limited to: (1) depositions of parties; (2) discovery motion practice related to those depositions; and (3) depositions of any witnesses included in a supplemental disclosure that are not presently listed on Plaintiffs' disclosures or supplements. This request is not made for purposes of delay, but merely to allow sufficient time to complete discovery in this case.

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¹ This case was one of several with similar scheduling conflicts that were presented to the Court.

² See 2:16-cv-01008-GMN-NJK, ECF No. 32.

II. DISCOVERY COMPLETED TO DATE

- Plaintiff served Interrogatories, Request for Admissions and Requests for Production of Documents upon Experian on June 16, 2016;
- Parties conducted Rule 26 conference on June 17, 2016;
- Experian served their initial disclosures on July 8, 2016;
- Experian responded to Interrogatories, Request for Admissions and Requests for Production of Documents served by Plaintiff on September 7, 2016;
- Experian served its confidential supplemental responses to Plaintiff's first set of requests for production on September 30, 2016.
- Plaintiff served First Supplemental Request for Production of Documents upon Experian on October 24, 2016;
- Experian served Requests for Admission upon Plaintiff on November 3, 2016;
- Experian served Requests for Production of Documents upon Plaintiff on November 3, 2016;
- Experian served Interrogatories upon Plaintiff on November 3, 2016;

III. DISCOVERY TO BE COMPLETED

- Deposition of Experian, pursuant to FRCP 30(b)(6), set for January 10, 2017;
- Deposition of Plaintiff;
- Experian's responses to Plaintiff's First Supplemental Request for Production of Documents due November 28, 2016;
- Plaintiff's responses to Experian's Requests for Admission due on December 6, 2016;
- Plaintiff's responses to Experian's Request for Production due on December 6, 2016;
- and
- Plaintiff's responses to Experian's Interrogatories due on December 6, 2016.

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1 **IV. PROPOSED NEW DISCOVERY DEADLINES**

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Discovery Deadline	Current Deadline	Proposed Deadline
Discovery Cut-Off (as limited above)	12/12/2016	2/9/2017
Amend the Pleadings and Add Parties	9/12/2016	No Change
Experts Disclosures	10/12/2016	No Change
Rebuttal Expert Disclosures	11/11/2016	No Change
Interim Status Report	10/4/2016	No Change
Dispositive Motions	1/10/2017	3/13/2017
Pretrial Order	2/9/2017	4/12/2017

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11 The parties stipulate that the pre-trial order deadline will be suspended if dispositive
 12 motions are timely filed until 30 days after the decision of the dispositive motions or until further
 13 order of the Court. The disclosure required by FRCP 26(a)(3) and objections thereto shall be
 14 made in the pre-trial order.

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1 **V. CONCLUSION**

2 Based upon the reasons set forth herein, the parties respectfully request that this Court
3 grant their request to extend time to complete discovery.

4 **IT IS SO STIPULATED.**

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6 DATED: November 18, 2016

DATED: November 18, 2016

7 KNEPPER & CLARK LLC

SNELL & WILMER L.L.P

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By: /s/ Bob L. Olson

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15 *Attorneys for Plaintiff Maria R. Van Zandt*

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18 **ORDER**

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20 **IT IS SO ORDERED.**

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United States Magistrate Judge

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23 DATED November 21 2016.